

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Cincearae Kelly : No. 22-11030-MDC
Debtor : :

ANSWER TO MOTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION, AS
SUCESOR TRUSTEE TO CITIBANK, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied for lack of specific proof.
7. Admitted.
8. Denied.
9. Denied.
10. Denied because Debtor is being offered assistance to
fully catch up her mortgage.
11. No objection.
12. Admitted.

WHEREFORE Debtor respectfully requests this Honorable Court
deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 07/25/2022

A copy of this Answer is being served on Rebecca A. Solarz,
Esquire, and the Chapter 13 Trustee.